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Attorneys for Defendant  
Safeway, Inc. and the Individual Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

LAWRENCE ROMANECK, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

SAFEWAY, INC., ROBERT EDWARDS,  
JANET E. GROVE, MOHAN GYANI,  
FRANK C. HERRINGER, GEORGE J.  
MARROW, KENNETH W. ODER, T. GARY  
ROGERS, ARUN SARIN, WILLIAM Y.  
TAUSCHER, CERBERUS CAPITAL  
MANAGEMENT L.P., AB ACQUISITION  
LLC, ALBERSTON'S HOLDINGS LLC,  
ALBERTSON'S LLC, and SATURN  
ACQUISITION MERGER SUB, INC.,

Defendants.

Case No. 4:14-cv-02015

**CLASS ACTION**

**STIPULATION EXTENDING TIME FOR  
DEFENDANT SAFEWAY, INC. AND THE  
INDIVIDUAL DEFENDANTS TO  
RESPOND TO THE COMPLAINT  
AND ORDER**

WHEREAS, this action ("Complaint") was filed on May 1, 2014;

WHEREAS, Defendant Safeway, Inc. ("Safeway") was served with the summons and  
Complaint on May 6, 2014;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1), Safeway's response is  
currently due on May 27, 2014;

1 WHEREAS, Rule 6-1(a) of the Civil Local Rules of the Northern District of California  
2 provides that the parties may stipulate to extend the time within which to answer or otherwise  
3 respond to the Complaint without a Court Order;

4 WHEREAS, the parties have agreed to a 30 day extension of time by which Safeway will  
5 respond to the Complaint;

6 WHEREAS Defendants Robert Edwards, Janet Grove, Mohan Gyani, Frank Herringer,  
7 George Marrow, Kenneth Oder, T. Gary Rogers, Arun Sarin, and William Tauscher ("Individual  
8 Defendants") agreed to waive service as of May 9, 2014;

9 NOW, THEREFORE, the undersigned parties, through their respective counsel, stipulate  
10 as follows:

11 Safeway and the Individual Defendants shall move against, answer or otherwise respond  
12 to the Complaint by and including June 26, 2014.

13 Dated: May 14, 2014

14 Respectfully submitted,  
15 LATHAM & WATKINS LLP

16 By: /s/ Patrick E. Gibbs  
17 Patrick E. Gibbs

18 Attorneys for Defendant Safeway, Inc.

19  
20 Dated: May 14, 2014

21 GLANCY BINKOW & GOLDBERG LLP

22 By: /s/ Lionel Z. Glancey  
23 Lionel Z. Glancey  
24 Michael Goldberg  
25 Louis N. Goldberg

26 Attorneys for Plaintiff Lawrence Romanek

27 Date: May 15, 2014

